

## DNR Response to Public Comments on Sections 7, 8 and 9 of the Draft State Forest Management Plan

December 4, 2007

The Michigan Department of Natural Resources (DNR) received eight comments that were directed to Section 7 (Appendices), Section 8 (Glossary) and Section 9 (Literature Cited) of the DRAFT State Forest Management Plan (SFMP). Comments focused on monitoring, plan revision drivers, and criteria and indicators. The DNR response to these comments follows.

A primary comment queried the purpose of indicator metrics. The purpose of metrics is fourfold: to measure the condition of a resource; to measure the level of stress or pressure on a resource; to provide a direct measure of a management action taken to either improve conditions or reduce stress on a resource; or to measure the outcome of management. Section 1.6 of the plan was revised to include these purposes. The use of metrics as a component of plan monitoring is addressed in Sections 1.6 and 6 of the SFMP.

The extent and scope of C&I metrics was also questioned. The scope of the core set of statewide criteria & indicator metrics has been added to Appendix E of the SFMP, and include:

1. Gathering information on a statewide basis (where applicable) from a variety of existing data sources;
2. Providing information on a statewide basis and may be broken down by ecoregion where applicable and where the robustness of the data is not compromised;
3. Gathering information related to all land ownerships, whether state-owned, public, corporate, or private lands;
4. Application to any and all land cover community types; and
5. Use for monitoring purposes by the ecoteams, divisions, and DNR workgroups, as needed.

All comments were specifically addressed metrics were used for revisions to the draft set of core criteria, indicators and metrics. The term "extent" is used in the text of several indicators, and a definition has been provided in the glossary. A suggestion was made to reduce the proposed set of seven Criteria down to three, which would address biological, social and economic values. This suggestion was not adopted because it would be a radical departure from and abandonment of several years of C&I development work that had already been accomplished by ecoteams. Comments recommended a process for selecting

and approving metrics be developed, and such a process was added to the SFMP.

Concern was expressed regarding the scalability of metric data. The scalability of data is dependent upon its source and the methodology by which it was compiled. Where the validity or robustness of data is not compromised (and no longer valid or defensible) data may be split to more meaningful scales (like subsections). Inventory data is an example of such scalable data. It would not be appropriate to rescale FIA (collected by sample plots), some census data (collected by county), and many other datasets that are only collected at the county level. For many metrics the DNR will not have a choice about how the data is collected, but will have to use it with recognition of its inherent limitations.

The commitment and obligation of the DNR to measure metrics was also updated in Appendix E of the SFMP. Metrics for which the DNR and other organizations currently have no means of measuring are coded as Tier 4 metrics, are not being measured. Divisional responsibility for measurement of metric was also added in Appendix E in response to comment.

Comment was accepted to provide a definition of Off-road Vehicle (ORV) in the glossary.

Comments were accepted to change the citation for the 1994 Water Quality Management Practices on Forest Lands guide to the draft 2007 document Sustainable Soil and Water Quality Practices on Forest Land.